

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Bruno Bellucci, III, Esquire  
Attorney ID# BBIII: 6378  
BellucciLaw, P.C.  
1201 New Road, Suite 138  
Linwood, NJ 08221  
(609)601-1500  
Attorneys for Debtor(s)

In Re:

Richard D. Cross  
Kimberly M. Cross

Case No.: 16-22957

Chapter: 13

Judge: Hon. Andrew B. Altenburg

**DEBTOR'S APPLICATION TO CONVERT PURSUANT TO SECTION 1307(a)**

TO THE HONORABLE Andrew B. Altenburg, Bankruptcy Judge:

Richard D. Cross and Kimberly M. Cross, the debtors herein, by and through Bruno Bellucci, III, Esquire of BellucciLaw, P.C., debtors' attorney, respectfully represents:

1. On July 5, 2016, the debtors filed a petition herein for relief under Chapter 13 of Title 11, United States Code, and said petition is presently pending.
2. Debtors are eligible to be debtors under Chapter 7 of said Title 11 and desires to convert this case to a case under Chapter 7 pursuant to section 1307(a) of said Title 11.
3. The above referenced case has not previously been converted under Bankruptcy Code Sec. 706, 1112, 1208, or 1307.

WHEREFORE, debtors pray for relief under Chapter 7 of said Title 11.

DATED: March 8, 2017

/s/ Richard D. Cross  
Richard D. Cross

DATED: March 8, 2017

/s/ Kimberly M. Cross  
Kimberly M. Cross